

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

IN RE:)	
)	Chapter 11
MERCY HOSPITAL, IOWA CITY,)	
IOWA, <i>et al.</i> ,)	Case No. 23-00623
)	
Debtors.)	(Jointly Administered)

OBJECTION TO TRUSTEE'S OBJECTION TO CLAIM (DAWNA MILLER)

COMES NOW Claimant Dawna Miller, by and through her undersigned counsel, and objects to the Trustee's Objection to Claim No. 298, and in support thereof states as follows:

1. The Trustee has objected to Claim No. 298 filed by Dawna Miller, asserting that the Trustee or his advisors are still investigating whether the claim has been paid or otherwise has any valid legal basis.
2. The Trustee has failed to state with particularity the factual basis for the objection and has instead simply indicated that further investigation is ongoing. This fails to satisfy the Trustee's burden to overcome the prima facie validity of the claim as filed.
3. The Claimant affirms that her claim is valid and properly filed, and that no evidence has been presented to suggest that the debt has been paid or is otherwise invalid.
4. Claimant objects to the Trustee's attempt to disallow the claim on speculative or incomplete grounds and reserves the right to supplement this objection as additional information becomes available.

WHEREFORE, Claimant Dawna Miller respectfully requests that this Court deny the Trustee's Objection to Claim No. 298, allow the claim as filed, and grant such other and further relief as may be just and proper.

Respectfully submitted,

Dated: April 17, 2025

/s/ Steven G. Klesner
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date below, a true copy of the foregoing document was electronically filed in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing systems. Parties may access this filing through the Court's electronic system.

Date: 4/17/2025

/s/ Dawn Krabill